

SHARTSIS FRIESE LLP
ERICK C. HOWARD (Bar #214107)
ehoward@sflaw.com
One Maritime Plaza, Eighteenth Floor
San Francisco, CA 94111
Telephone: (415) 421-6500
Facsimile: (415) 421-2922

LEWIS RICE LLC
Richard B. Walsh, Jr.
rwalsh@lewisrice.com
Michael J. Hickey
mhickey@lewisrice.com
Sarah A. Milunski
smilunski@lewisrice.com
Michael H. Durbin
mdurbin@lewisrice.com
600 Washington Avenue, Suite 2500
St. Louis, MO 63101
Telephone: (314) 444-7600
Facsimile: (314) 241-6056

Attorneys for Defendant
SRAM, LLC

Robert F. McCauley (Bar #162056)
robert.mccauley@finnegan.com
Jeffrey D. Smyth (Bar # 280665)
jeffrey.smyth@finnegan.com
Christopher B. McKinley (Bar #306087)
christopher.mckinley@finnegan.com
FINNEGAN, HENDERSON,
FARABOW, GARRETT &
DUNNER, LLP
3300 Hillview Avenue
Palo Alto, California 94304
Telephone: (650) 849-6600
Facsimile: (650) 849-6666

Attorneys for Plaintiff
FOX FACTORY, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

FOX FACTORY, INC.,

Plaintiff,

v.

SRAM, LLC,

Defendant.

Related Case Nos.
3:16-CV-00506-WHO AND
3:16-CV-03716-WHO

**JOINT STIPULATED REQUEST TO
AMEND THE CASE SCHEDULE;
ORDER**

To accommodate the schedule of SRAM's counsel, Plaintiff FOX Factory, Inc. ("FOX Factory") and Defendant SRAM, LLC ("SRAM") respectfully stipulate, with the Court's permission, to continue certain dates in the Court's case schedule as provided below.

In response to the Court's recent Order denying the parties' prior proposed amended schedule and directing the parties to further meet and confer (Dkt. 50 in Case 3:16-cv-00506-WHO, at 4), counsel further met and conferred and jointly communicated with Ms. Davis by email regarding scheduling. The net result is that Ms. Davis has advised that the Court is available for tutorial and claim construction hearings on September 22 and 29, 2017, respectively, and these are the first dates offered by the Court that are also available to both parties. To accommodate this proposed change, and mindful of the Court's requirement that there be at least three months between the dispositive motions hearing date and trial (*id.*), the parties respectfully propose the amended case schedule below.

In view of the proposed continued dates for the tutorial and claim construction hearings, the parties' proposal would extend various dates by generally corresponding amounts, including the dates for the close of fact discovery and the exchange of expert reports. The parties' proposal would allow at least three months between the proposed date for hearings on dispositive motions and the first proposed trial date. In light of the proposed revised schedule, the parties also propose that each party have an additional week to file the opposition and reply claim construction briefs, which briefing would be complete more than three months before the proposed tutorial and claim construction hearing dates.

More specifically, the parties stipulate and respectfully request that the Court modify the following dates in the case schedule as provided below (all other dates in the Court's schedule to remain unchanged):

Event	Current Date	Proposed New Date
Deadline to Amend Pleadings	April 21, 2017	July 21, 2017
FOX Factory Opening Claim Construction Brief	April 27, 2017	April 27, 2017 (same)
SRAM Responsive Brief	May 11, 2017	May 18, 2017
FOX Factory Reply Briefs	May 18, 2017	June 1, 2017
Tutorial Hearing	June 2, 2017	September 22, 2017
Claim Construction Hearing	June 9, 2017	September 29, 2017

Event	Current Date	Proposed New Date
Close of Fact Discovery	September 29, 2017	December 20, 2017
Initial Expert Reports (on issues upon which party bears burden of proof)	October 20, 2017	January 25, 2018
Rebuttal Expert Reports	November 20, 2017	February 26, 2018
Motion for Consolidation	November 21, 2017	January 31, 2018
Close of Expert Discovery	December 22, 2017	March 30, 2018
Last Day to File Dispositive Motions	January 22, 2018	April 25, 2018
Dispositive Motions heard by	February 28, 2018	May 30, 2018
Pretrial Conference	April 30, 2018	August 16, 2018, subject to the Court's availability
Trial	May 29, 2018 and June 25, 2018	September and October 2018, approximately one month apart and subject to the Court's availability

DATED: March 17, 2017

Respectfully submitted,

SHARTSIS FRIESE LLP

By: /s/ Erick C. Howard

Erick C. Howard
Attorneys for Defendant
SRAM, LLC

DATED: March 17, 2017

FINNEGAN, HENDERSON, FARABOW,
GARRETT & DUNNER, LLP

By: /s/ Jeffrey D. Smyth

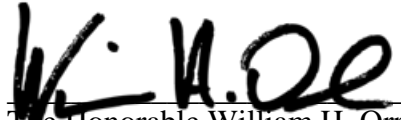
Jeffrey D. Smyth
Attorneys for Plaintiff
FOX Factory, Inc.

ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED, except as modified below:

Pretrial Conference	April 30, 2018	August 13 , 2018
Trial	May 29, 2018 and June 25, 2018	September 10, 2018 and November 5, 2018.

Dated: March 22, 2017


 The Honorable William H. Orrick
 United States District Judge
 Northern District of California